

This comment is on behalf of the Tehama County Cattlemen's Association (TCCA) representing over 100 cattlemen in Northern California. Tehama County is one of the premier cattle producing counties in California with winter foothill range ground and highly productive summer irrigated pasture. Tehama County Cattlemen recognizes the urgent need for an animal identification system that has a 48-hour trace back ability. With this in mind, the Association would like to bring forward some very pressing concerns within USDA's current National Animal Identification System (NAIS) draft.

Although current prices are at an all time high, price volatility and know historic swings in the livestock market make it very predictable that this will not continue to be the case. In a long term and historical view, the business of running cattle leaves a very small margin of profit. Knowing there is a limited amount of funds for USDA's implementation of this program compared to other countries already active in identification programs, TCCA has several concerns on the expenses being passed on to the producer level.

Within these monetary concerns, TCCA fears the current trend toward a system incorporating a high technology input would not be to the economic benefit of all producers. Although some segments of the industry may see management benefits of a high technology system able to identify each animal individually, many commercial operations will not benefit from a specific individual animal identification. The added costs and time of monitoring each animal individually would cut into many producers' already slim margins of profit. It is for this reason that TCCA supports the use of a low technology system with the identification being left to the premise itself and not the individual animal.

In keeping with monetary concerns, animal identification through the brucellosis program has proven to be very successful in trace-back ability. This program was successful with only about 25% of animals being tagged (one-half born heifers, then one-half kept as replacements). Market reports show that value added products bring higher prices in the market place; such as advanced vaccination or natural programs. Animal identification has already proven to add value to those animals that are source verified. Added marketability encourages producers to enroll in an identification system with the option of their added management bringing added monetary returns. With this type of opportunity it is very likely that far more than 25% of livestock producers would be involved in the program. Making the identification program mandatory would eliminate added demand for source verification, in turn adding another overhead cost to producers. Thus, it is recommended that the voluntary system be hastily implemented with a future reevaluation of its necessity for mandatory status.

TCCA shares a national concern with confidentiality and liability due to the current Freedom of Information request that government is forced to deal with. Although legislation can be initially passed to protect the confidentiality of producer's information, TCCA has great apprehension that future litigation will prove this legislation worthless. It is suggested that USDA look at working with private industry to develop a database that has more assurance of confidentiality than a government database. An example of this work can be seen through the National Cattlemen's Beef Association in developing a database.

As California has implemented and often modified a very instrumental identification program through the use of a registered brand, TCCA suggests that any implementation of an identification system be made to run directly with the use of a national brand registration.

Tehama County Cattlemen's Association would finally like to add the importance of this plan being carried through the legislative process as its original intent, an animal health issue. Any use of this topic as a food safety issue would unnecessarily lower consumer confidence in a very safe product.